

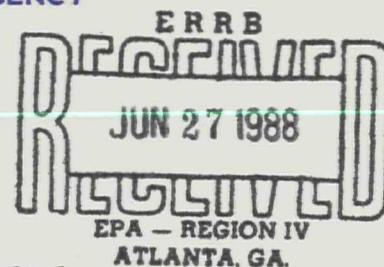


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

Site: _____
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Date: **JUN 22 1988**

Subject: Review of the Revised Draft Work Plan for the Remedial Investigation (RI) / Feasibility Study (FS) at the Medley Farm Site, Gaffney, SC

From: Gail Mitchell Vanderhoogt, Chief *Gail Vanderhoogt*
Ground-Water Technology Unit

To: Jon Bornholm, Project Manager
NC/SC Site Management Unit, Superfund Branch

The subject work plan has been reviewed as per your request of June 14, 1988 with a major regard to the incorporation of the recommendations and comments presented in our memorandum of April 14, 1988. We acknowledge that several of our previous recommendations and comments were addressed in the revised work plan. However, we still have some concerns and address these below.

Comments and Recommendations on the Draft Work Plan

1. Section 3.6.3 (page 27) - Will monitor well pair MW-1 provide background ground-water quality data? This well pair is said to be "upgradient from former disposal and storage areas" as well as "between the former disposal and storage area and the Sprouse domestic water well." The Sprouse well was effected by VOC contamination believed to be migrating from the site. Therefore, it is questionable as to whether MW-1 will provide background ground-water quality data. Upon evaluation of the Phase IB ground-water quality results, it may be found that another monitor well pair will be required in Phase II to acquire such data.

2. Section 3.6.7 (page 37) - Contaminant transport modeling is proposed "as an attempt to define the potential impacts of residual contamination and to predict future dispersion and migration patterns." In order to properly calibrate such a model to historical site conditions, all monitor wells will have to be sampled at the same time. As proposed in the work plan, monitor well clusters MW-2 and MW-4 will be sampled in Phase IA and these results will be used to develop the specific list of indicator parameters; then in Phase IB monitor well clusters MW-1 and MW-3 will be sampled. We recommend that all monitor well clusters be sampled in Phase IB for the specific list of indicator parameters. This data can then be used as the historical conditions for any solute transport modeling calibration.



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3. Section 3.9.3 (page 44) - Monitor well pair MW-2 is proposed within the southeast boundary of the suspected disposal area. As such, contaminated soils may be encountered in drilling this well. Therefore, we recommend that cuttings from this well pair are handled in a more cautious manner than that proposed.

Hopefully, these comments and recommendations will be helpful in finalizing the Work Plan for the RI/FS at the Medley Farm Site. We would welcome the opportunity to review future reports documenting the field investigation findings. If you should have any questions, please contact Rich Muza at x3866.